

GREGORY P. STONE (State Bar No. 78329)
gregory.stone@mto.com
BRADLEY S. PHILLIPS (State Bar No. 85263)
brad.phillips@mto.com
STEVEN M. PERRY (State Bar No. 106154)
steven.perry@mto.com
BETHANY W. KRISTOVICH (State Bar No. 241891)
bethany.kristovich@mto.com
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue, 35th Floor
Los Angeles, California 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

Attnorneys for Defendant Intel Corporation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

**IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION**

Master Docket No. 11-CV-2509-LHK

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**DECLARATION OF GREGORY M.
SERGI ON BEHALF OF INTEL IN
SUPPORT OF DEFENDANTS' JOINT
RESPONSE TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
REGARDING FILINGS RELATED TO
PLAINTIFFS' MEMORANDUM OF
LAW IN SUPPORT OF APPLICATION
OF THE PER SE STANDARD**

I, Gregory M. Sergi, hereby declare and say:

2 1. I am an attorney with Munger, Tolles & Olson LLP, counsel of record for Intel
3 Corporation (“Intel”) in this case, and am admitted to practice before this Court. I make this
4 declaration in support of Defendants’ Joint Response to Plaintiffs’ Administrative Motion To Seal
5 Regarding Filings Related to Plaintiffs’ Memorandum of Law in Support of Application of the Per
6 Se Standard being filed concurrently with this Declaration. On behalf of Intel, I make this
7 declaration pursuant to Local Rules 79-5(d) and 7-11(a) to demonstrate good cause for the
8 portions of the document described below to be filed under seal. If called and sworn as a witness,
9 I could and would competently testify to the matters stated below.

10 2. I have reviewed the document listed below, and made specific, narrowly tailored
11 redactions where necessary to protect highly confidential and highly sensitive Intel information
12 regarding its compensation, hiring, and recruiting practices.

3. Amended Expert Report of Edward A. Snyder, Ph.D. (December 6, 2013)

14 [Cisneros Exhibit 7]: The grounds for redactions of Intel confidential information in this
15 document are stated in the Declaration of Gregory M. Sergi on behalf of Intel in Support of
16 Defendants' Renewed Motion to Seal Materials in Connection with Summary Judgment and
17 Daubert Motions, Docket Item 854, ¶¶ 3, 19, 45-46 (filed Apr. 10, 2014).

19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct.

21 || Executed this 14th day of April, 2014 at Los Angeles, California.

22 DATED: April 14, 2014

/s/ Gregory M. Sergi

Gregory M. Sergi